

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE WESTERN DISTRICT OF MISSOURI WESTERN DIVISION**

**SADIG ABDELMAGID,**

Plaintiff,

v.

**GL RESOURCES, LLC, et al.,**

Defendants.

**Case No. 24-cv-366**

---

**PLAINTIFF’S MOTION FOR LEAVE TO AMEND COMPLAINT TO ADD GL  
PARTNERS, INC. AS DEFENDANT AND FOR LIMITED JURISDICTIONAL  
DISCOVERY**

Plaintiff Sadig Abdelmagid, appearing **pro se**, respectfully moves this Court for leave to amend his complaint to add GL Partners, Inc. (“GL Partners”) as a defendant and to permit limited jurisdictional discovery into the relationship between GL Partners and GL Resources, LLC. This motion is brought pursuant to **Federal Rule of Civil Procedure 15(a)(2)** and supported by newly discovered facts through litigation and public records.

---

## **I. INTRODUCTION**

Plaintiff was employed by a cannabis related company operating under the “Greenlight” brand and initially named GL Resources, LLC as the employer. However, corporate disclosures and state records confirm that GL Partners, Inc. wholly owns GL Resources, LLC and directs or controls essential operations including compliance, personnel, and trademarks.

Because GL Partners effectively controls the operations at issue, Plaintiff respectfully requests (1) leave to amend the complaint to name GL Partners as a defendant, and (2) leave to conduct limited jurisdictional discovery to determine whether GL Partners and GL Resources operate as a unified entity under the **alter ego doctrine**.

---

## **II. GROUNDS FOR AMENDMENT**

Under **Federal Rule of Civil Procedure 15(a)(2)**, courts “should freely give leave [to amend] when justice so requires.” Plaintiff now seeks to include GL Partners as a named defendant based on facts only recently confirmed through discovery and disclosures.

Key facts:

- GL Partners, Inc. is the **parent company** of GL Resources, LLC, as stated in Defendants’ Rule 7.1 disclosure (ECF No. [insert once verified]).

- GL Partners owns the “**Greenlight**” trademark, used across all business operations including those run by GL Resources.
- **Krystal Wright**, who Plaintiff served on March 19, 2025, is both the registered agent for GL Partners and the compliance officer for all cannabis DBAs under “Greenlight” with the Missouri DHSS.
- GL Resources does not appear to be actively registered as a standalone business in the Missouri Secretary of State database.

Together, these facts suggest that GL Resources is merely a conduit through which GL Partners operates, supporting amendment under both fairness and efficiency principles.

---

### III. BASIS FOR ALTER EGO LIABILITY

Under Missouri law, a parent company can be held liable for a subsidiary’s actions if:

1. The parent exerts **complete control and domination** over the subsidiary, and
2. That control is used to **commit fraud or injustice**.

See *Radaszewski ex rel. Radaszewski v. Telecom Corp.*, 981 F.2d 305, 306 (8th Cir. 1992).

Here, Plaintiff alleges that:

- GL Partners and GL Resources share officers, operations, and compliance structures.
- Plaintiff's work—including hiring, management, and termination—was all conducted under the Greenlight brand.
- GL Partners, not GL Resources, holds the regulatory and trademark authority.

Therefore, allowing GL Resources alone to shield GL Partners from liability would frustrate justice and reward evasive structuring.

---

#### IV. REQUEST FOR JURISDICTIONAL DISCOVERY

Defendants have argued that GL Resources is an independent entity and that service on Krystal Wright was ineffective. To resolve these issues, Plaintiff seeks leave to conduct **limited jurisdictional discovery**, including:

- Interrogatories and document requests on the **shared management**,
- **Licensing agreements**,

- **Internal governance,**
- **Payroll structures,**
- **Overlapping branding and email domains,**
- **Financial interdependence, and**
- Any other material establishing functional or legal unity between the entities.

Such discovery is common in alter ego claims and is appropriate when jurisdictional facts are in dispute.

---

## **V. SERVICE ON GL PARTNERS**

Plaintiff personally served **Krystal Wright**, the registered agent of GL Partners, on March 19, 2025. She serves as the compliance contact for over 20 Greenlight DBAs licensed by the Missouri Department of Health and Senior Services and is operationally integrated into all compliance functions. Her role qualifies her as an appropriate person for service under **Rule 4(h)(1)(B)**.

GL Partners has **actual notice**, and Defendants have participated in discovery and filed substantive motions, demonstrating no prejudice from allowing the amendment.

---

## VI. CONCLUSION

For the reasons above, Plaintiff respectfully requests that this Court:

1. Grant **leave to amend** the complaint to name **GL Partners, Inc.** as a defendant;
  2. Permit **limited jurisdictional discovery** to determine the operational unity between GL Partners and GL Resources;
  3. Recognize that **service on Krystal Wright** was sufficient for both entities; and
  4. Grant any other relief the Court deems just and proper.
- 

**Respectfully submitted,**

/s/ Sadig Abdelmagid

**Sadig Abdelmagid**

604 NE 71 Street

Kansas City, Missouri 64118

Sadigh2313@gmail.com